

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION
OF THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX
REFUND SCHEME LITIGATION,

This document relates to 1:18-cv-05053-LAK

MASTER DOCKET

Case No. 1:18-md-02865-LAK

PROPOSED PROTECTIVE ORDER

WHEREAS Third-Party Defendant ED&F Man Capital Markets Ltd. (“ED&F Man”), respectfully moves, pursuant to Fed. R. Civ. P. 5.2, for a Protective Order to redact confidential party information from a document that was filed by ED&F Man in connection with ED&F Man’s Motion to Dismiss the Third Party Complaint (the “Motion to Dismiss”); and

WHEREAS **Exhibit C** to ED&F Man’s Motion to Dismiss (Document 170-3), as filed, contained bank account and tax ID numbers on pages 1, 7, and 8, relating to Sheldon Goldstein and the Goldstein Law Group 401(K) Profit Sharing Plan, both parties in this litigation; and

WHEREAS counsel has redacted this document and now seeks to re-submit it herewith;

THEREFORE, it is ORDERED that ED&F Man is granted permission to file the exhibit identified herein and attached to the accompanying Declaration of Brian S. Fraser, in redacted form, in support of ED&F Man’s Motion to Dismiss.

Dated: September __, 2019

United States District Judge